

April 10, 2004

RE: RM-10869

Dear Commissioners,

This petition is a modified version of a petition submitted for comment in October 2003.

The petitioner presents no legitimate argument for retaining the code. His only point concerning retaining the CW is on the doomsday concept that "it will get through when nothing else will".

We have no Key component of communications that demands us to retain CW as a requirement. Homeland Security is not requiring Amateurs to know Morse code.

Under the difficult communication conditions that the petitioner anticipates, what "secure-coded" message would Amateurs be allow to see. This idea is right out of the movies.

Most Amateurs are not trained for emergency communications. There is no testing requirement for an Amateur to show his/her ability in emergency situations. The idea that Amateurs are a ready group of trained emergency operators is simply not true. The ability to send and receive CW does not make an operator "skilled" in handling emergency traffic.

If CW was really important for emergency communication, the FCC should require police, fire, and any other emergency service to be proficient in Morse code.

In recent years, emergency frequencies have been protected from interference on the Amateur bands. The frequency assignments have always been in the voice portion of the band. The main reason for assigning a frequency in the voice portion is due to the greater number of operators who could participate.

This petition is nothing more that regressing back to higher code speeds for the Extra Class.

Please deny this petition.

Regards,
Melvin Lehmann